## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: DERRIK ANTHONY KUHNS and STACI ANN KUHNS,	) ) )
Debtors,	) Bankruptcy No. 16-21971-GLT
	) Chapter 13
DERRIK ANTHONY KUHNS and, STACI ANN KUHNS,	) Document No.
Movant,	) Related to Doc. No.
-vs-	
CITIMORTGAGE, INC.,	)
Respondent.	)

## <u>DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE FILED</u> <u>BY CITIMORTGAGE, INC., ON OCTOBER 27, 2017</u>

- I, Matthew R. Schimizzi, Esquire, counsel for the Debtors, hereby state the following:
- 1. Respondent, CitiMortgage, Inc., filed a Notice of Mortgage Payment Change on October 27, 2017, pursuant to which the escrow payment amount is reduced from \$353.62 to \$346.50.
- 2. As a result of the reduction in the escrow amount, the mortgage payment will be reduced from \$474.45 to \$467.33, effective December 1, 2017.
  - 3. Debtor's current Plan payment is sufficient to fully fund the Plan.

Respectfully submitted: SCHIMIZZI LAW, LLC

Date: November 22, 2017

BY: /s/ Matthew R. Schimizzi

Matthew R. Schimizzi, Esquire

Counsel for Debtors

PA I.D. 307432